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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

October 4, 1993

Mr. Lee Michael
Westinghouse Hanford Company
740 Stevens Center #MS H6-08
P.O. Box 1970
Richland, WA 99352

9313044.3496

Dear Mr. Michael:

Re: Entry of Site Visit Report to Administrative Record
224-T TRUSAF (S-2-2, M-20-23)

This letter transmits the Washington State Department of Ecology's request to enter the above referenced document to the 224-T Transuranic Waste Storage and Assay Facility Unit, Resource Conservation & Recovery Act (RCRA) Administrative Record. Enclosed is a copy of the report. If you are unable to enter the document to the administrative record, please notify me, and I will pursue the entry effort at the unit managers' meeting.

If you or your staff have any questions concerning this request, please contact me at (509) 736-3034.

Sincerely,

Alisa D. Huckaby

Alisa D. Huckaby
Nuclear and Mixed Waste Management Program

AH:sl
Enclosure: 324-T TRUSAF Site Visit Report

cc: (without enclosures)
Cliff Clark, DOE
Dan Saueressig, WHC
Dan Duncan, EPA
Doug Sherwood, EPA

224-T Transuranic Waste Storage and Assay Facility (TRUSAF)
(Group # S-2-2, Milestone M-20-23)
September 14, 1993, Site Visit Report by Alisa D. Huckaby

On September 14, 1993, Washington State Department of Ecology (Ecology) representatives Jerry Hensley, Jeanne Wallace, Casey Ruud, and myself toured the 224-T TRUSAF unit. During the tour, Ecology representatives were accompanied by Nancy Shoemaker (WHC), Matt LaBarge (WHC), Jerry Todd (WHC), Kent McDonald (WHC), Roger Szelmeczka (USDOE), and Kevin Kline (USDOE). Primarily, Nancy Shoemaker conducted the tour, but Kent McDonald provided information regarding the Part B Permit Application, Matt LaBarge provided information about the Backlog Wastes, and Jerry Todd provided information on operations.

Ecology representatives "WRAMed" (Westinghouse Radiation Area Management system for gaining access to the facility) in from approximately 12:30 - 12:55 p.m. at a WRAM station located in trailer number 271 in the 200 West Area. Ecology representatives then drove to the 224-T TRUSAF unit, donned hard hats and safety glasses, and entered the first floor of the building at the far northwest entrance. The group (including WHC and DOE representatives) progressed south past the elevator and proceeded to the south entrance of the building. This area, shown as "transuranic mixed waste initial storage" and "receiving area" on Figure 2-3 (attached) is used to unload, receive, and initially "store" newly received waste. At this time, there were approximately 70 drums stored in this area, about 50 of which were Backlog Waste drums. Shoemaker and LaBarge explained to Ecology representatives that a pilot project with the Backlog Waste drums was being conducted to develop a waste analysis work plan for which Real Time Radiography (RTR) and assaying techniques would be utilized. It was also explained that the pilot project consisted of "assaying" approximately 1400 Backlog Waste drums within the next year. It was described that an average time period of one to seven days represented the time required to assay and x-ray a Backlog Waste drum from the receipt to the return of the drum. While in this area, the attached photographs, numbered 1, 2, 3, and 4, were taken.

The group proceeded north to the area housing the real-time radiography x-ray system, (shown on attached Figure 2-3). While in this area, photographs numbered 5 and 6 were taken. While in this area, Shoemaker explained that in the future, there will not be drums located in this area due to the x-ray equipment. Shoemaker further explained that the drums were located in this area temporarily while floor sealants were being tested in one of the storage arrays. While in the x-ray radiography room, two continuous airborne monitors (CAMs) were noted. Shoemaker explained that one of the CAMs was an alpha CAM and the other was a beta CAM. Shoemaker further explained that the alpha CAM was for the transuranic wastes and the beta CAM was for the backlog wastes.

From the x-ray radiography room, the group proceeded north to the transuranic waste assayer (TWA) room shown on attached figure 2-3. While in this room, photographs numbered 7, 8, and 9 were taken. While in this room a circular pattern (approximately two feet in diameter) was noted in the concrete (see photograph number 8). A second circular pattern (approximately six inches in diameter) was also noted in this room located near the corner of a rectangular pattern which appeared to be slightly lower than the surrounding concrete (see photo number 9).

The group then proceeded to the northern-most end of the building where several storage modules were noted (shown as modules numbered 2, 3 and 4 on attached Figure 2-3). Within this area, 1989 waste accumulation dates were noted on some of the hazardous waste labels. Shoemaker explained that the facility contained drums which were shipped to 224-T TRUSAF of which could not be accepted or certified because of limitations ralated to the x-ray radiographic techniques utilized and the certification criteria imposed by the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico, where the waste is proposed to be disposed. LaBarge further explained that since the drums were over 90 days old, they could not be shipped back to the generator.

The group then proceeded to the second floor at the south end of the building. The area is shown on Figure 2-4 as the shaded area designated for "transuranic mixed waste as designated by supervisor." Within this area, one area, approximately 20' X 20' and marked with a line of tape, was labelled "oxidizers" (see attached photograph number 11). Directly adjacent, was an area labelled "satellite accumulation" (see attached photograph number 12). In this same room, there were areas with signs stating "acids, return to generator," etc. Photograph number 13 was taken of drums stored in one such open array module. While in this area, it was noted by Ruud, that one drum located in a "return to generator acids" module was not labelled with a hazardous waste label, although it had a "corrosive" label facing the wall. Photograph number 15 was taken of this drum and Ruud requested a copy of the documentation for this drum which was in a plastic envelope on top of the drum. Shoemaker provided a copy (copy attached). Also while in this area, a rectangular shaped patch was noted beneath the satellite accumulation drum (see photograph number 12). Shoemaker and McDonald explained that a sealant was being "tested." Shoemaker further explained that the sealant selected for upgrading the secondary containment would be grey in color rather than the brown color sealant tested in the satellite accumulation area. Also while in this room, Hensley and Wallace noted ceiling cracks which appeared to be discolored as though indicating leakage (see attached photograph number 14).

The group then proceeded north to the next room (shown on Figure 2-4 as unshaded portion with open array modules numbered 2-1 through 2-9). While in this room, additional discolored ceiling cracks were noted. Photographs numbered 16, 17, 18, 19, and 20 were taken in this room. The storage arrays (2-1 and 2-2) at the northern-most end of the building contained drums with higher radiation readings.

Shoemaker explained that many of the drums in this area were listed as awaiting shipment to WIPP in New Mexico.

The group then proceeded to the third floor. Photographs 21, 22, 23, and 24 were taken in this area. On the northern wall, south of the elevator, photographs numbered 23 and 24 were taken of which show peeling paint and associated discoloration. While in this area, Shoemaker explained that a new roof had been put on the facility approximately two years ago. When asked about roof repairs, Shoemaker further explained that she was aware of three leaks since the new roof was put in place, but that each leak had been repaired immediately upon identification.

The group returned to the first floor where the elevator which is utilized to transport drums to the different floors was noted. Photograph number 25 was taken of the elevator.

Prior to being radiologically "surveyed out," McDonald explained that plans were progressing to enter the radiologically contaminated process cells B and F (shown on attached Figure 2-3) on September 28 or 29, 1993. Ecology representatives left the facility at approximately 2:00 p.m.

Enclosures: Photographs Numbered 1 Through 25
Photograph Log
Figures 2-3, 2-4, and 2-5
Documentation For Drum # 89-234

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
A. D. Huckaby, Ecology	L. Michael, WHC	Incoming 9305723

Subject: ENTRY OF SITE VISIT REPORT TO ADMINISTRATIVE RECORD 224-T TRUSAF (S-2-2, M-20-23)

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